

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ARLENE J. DELGADO,

Plaintiff,

v.

DONALD J. TRUMP FOR PRESIDENT,  
INC., TRUMP FOR AMERICA, INC.,  
SEAN SPICER, individually, REINCE  
PREIBUS, individually,

Defendants.

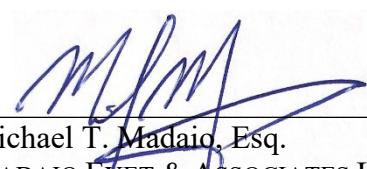
Civil No. 1:19-cv-11764-AT-KHP

**NOTICE OF MOTION FOR SANCTIONS  
PURSUANT TO THE COURT'S  
INHERENT POWER AND 28 U.S.C. §  
1927**

**PLEASE TAKE NOTICE** that that non-party, Eric Trump, hereby moves this Court, before the Hon. Katherine H. Parker, located at 500 Pearl Street, New York, NY 10007, on a date to be set by the Court, for entry of an order imposing sanctions against the plaintiff, Arlene J. Delgado pursuant to the Court's inherent power and 28 U.S.C. § 1927, sanctioning Plaintiff for a monetary amount that the Court deems appropriate, awarding attorneys fees', expenses and costs to Mr. Trump, and for such other relief that the Court may deem just and proper.

This motion is supported by the annexed memorandum of law, any arguments or evidence presented in reply, all arguments or evidence presented at a hearing or with leave of Court, and upon all prior proceedings, pleadings, and filings in this action.

Dated: April 18, 2025

  
Michael T. Madaio, Esq.  
MADAIO EYET & ASSOCIATES LLP  
112 West 34<sup>th</sup> Street, 17<sup>th</sup> & 18<sup>th</sup> Floors  
New York, New York 10120  
E-mail: mmadaio@me-firm.com  
Attorneys for Non-Party Eric Trump